

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

THE DAILY WIRE, LLC *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT  
OF STATE, *et al.*,

Defendants.

Civil Action No.: 6:23-cv-00609 (JDK)

**JOINT MOTION TO FURTHER STAY PROCEEDINGS**

The parties jointly and respectfully move this Court to further stay this case for an additional 45 days, until April 4, 2025. Good cause supports this request for the following reasons:

1. On December 20, 2024, the parties jointly moved this Court to stay this case for 60 days, until February 18, 2025. *See* Joint Motion to Stay Proceedings, ECF No. 98. In support, the parties explained that, absent Congressional action, the Global Engagement Center (“GEC”)—the focus of a significant portion of Plaintiffs’ Complaint—would terminate on December 23, 2024. *See id.* at 1. The parties further explained that the change in Administration may affect the plans for future activities of Defendants and the nature and scope of any resolution to this case. *See id.* Additionally, Defendants had previously informed the Court that on December 6, 2024, the Department of State had transmitted a notification to Congress regarding its plan for the forthcoming termination of the GEC and its plan to realign the Center’s staff and funding to other Department offices and bureaus for foreign information manipulation and interference activities in the event that the termination is not extended. *See* Defs.’ Notice of Case Development, ECF 91 at 1-2. On December 23, 2024, the Court granted the parties’ joint motion, thereby staying this

case until February 18, 2025. *See* Order Staying Case, ECF No. 99. The Court further ordered that the parties file a status report and further motion or proposed schedule by February 25, 2025. *See id.*

2. The GEC terminated on December 23, 2024, pursuant to section 1287(j) of the National Defense Authorization Act for Fiscal Year 2017 (P.L. 114-328), as amended by section 1284 of the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (P.L. 115-232). On January 20, 2025, the President of the United States issued Executive Order 14149, “Restoring Freedom of Speech and Ending Federal Censorship,” 90 Fed. Reg. 8,243 (Jan. 20, 2025), which reflects the position of the United States and provides that, among other things, “[n]o Federal department, agency, entity, officer, employee, or agent may act or use any Federal resources in a manner contrary to” § 2 of the EO, which provides in turn, among other things, in § 2(c), that “[i]t is the policy of the United States” to “ensure that no taxpayer resources are used to engage in or facilitate any conduct that would unconstitutionally abridge the free speech of any American citizen.”

3. In light of that Executive Order and the change in Administration, and because discussions about the Department of State’s activities as relevant to this case are ongoing, Defendants request additional time to confer with new leadership, including within the Department of Justice and the Department of State, about this matter and to develop, and give full consideration to, their position in this case, and to confer with Plaintiffs as appropriate to determine whether a resolution of this case without further litigation is possible. Undersigned counsel for Defendants contacted counsel for all Plaintiffs on February 6, 2025 regarding this motion. Plaintiffs requested a meeting with the new leadership of the State Department to discuss their concerns over the potential continuation of the conduct that led to this lawsuit. Defendants respectfully declined and

advised Plaintiffs that, at this time, Defendants believe the parties can continue to have productive conversations regarding this litigation through counsel, as is the ordinary course. Counsel for all Plaintiffs then consented to and now join in the requested extension.

5. Accordingly, the parties respectfully request that the Court extend the stay of this case by 45 days, until April 4, 2025. The parties agree that the same terms to which they stipulated as to the current stay period apply during the extended stay period. *See* Joint Motion to Stay Proceedings at 1-2, ECF No. 98. Consistent with the current schedule, the parties further propose that they file a status report by April 11, 2025, advising the Court of their position and, if appropriate, proposing a schedule for further litigation. A proposed order accompanies this motion.

DATED: February 14, 2025

Respectfully submitted,

/s/Jenin Younes

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**CERTIFICATE OF SERVICE**

I hereby certify that, on February 14, 2025, I caused a true and correct copy of the foregoing to be filed by the Court's electronic filing system, to be served by operation of the Court's electronic filing system on counsel for all parties who have entered in the case.

/s/Cristen C. Handley  
Cristen C. Handley